



Mr. Kevin Bilash
USEPA Region III
Land, Chemicals & Redevelopment Division 3LD20
1650 Arch Street
Philadelphia, PA 19103

December 22, 2022
File No. 4862.10

Re: Marcus Hook Terminal
Monthly Progress Report – December 2022
Area of Interest 7
Marcus Hook, PA

Dear Mr. Bilash:

This monthly progress report is being submitted on behalf of the Evergreen Resource Management Operations (Evergreen) for Area of Interest (AOI) 7 at the Marcus Hook facility. Note that on March 1, 2022, Sunoco Partners Marketing & Terminals L.P. changed its name to Energy Transfer Marketing & Terminals L.P. (Energy Transfer) and the facility changed its name from Marcus Hook Industrial Complex (MHIC) to Marcus Hook Terminal (MHT). On December 9, 2021, a Revised Interim Measures (IM) Workplan was submitted to the United States Environmental Protection Agency (USEPA) to address arsenic in the subsurface at AOI 7. The IM Workplan was approved by the USEPA on February 15, 2022. The discussion below provides an update on IM pre-design investigation (PDI) activities and Bench Scale Treatability Study activities.

Activities completed this reporting period

Bench Scale Treatability Study activities occurred in the treatability lab at Terra Systems, Inc. (Terra Systems) in Claymont, Delaware. Specifically, rebound test activities were completed in accordance with the Revised IM Workplan. The results of the treatability testing will be submitted in the January 2023 progress report since the Bench Scale Treatability Study is now completed.

Activities planned for the next reporting period

The porewater sampling scheduled for December 5, 2022 has been tentatively planned for January 2023.

Deviation from approved activities this reporting period

There were no deviations from the approved activities for this reporting period.

Deviation from approved schedule

As requested by the USEPA during the August 15, 2022 meeting, Sanborn Head prepared a technical memorandum summarizing the Porewater Sampling Plan for additional porewater



sampling at select locations that was provided in an attachment to the September 2022 Monthly Progress Report. On October 13, 2022, USEPA provided comments to Evergreen on the proposed Porewater Sampling Plan. On October 26, 2022, USEPA, Evergreen, and Sanborn Head met to discuss the USEPA comments and the overall scope of work for the Porewater Sampling Plan.

Based on the outcomes of that discussion, the additional porewater sampling event was postponed to a December 5, 2022 start date. A draft response to USEPA comments were verbally provided in a follow-up call with USEPA, Evergreen, and Sanborn Head on November 9, 2022 in relation to the scope of work for the additional porewater sampling activities. On November 14, 2022, the written details of the additional calculations were provided to the USEPA to address comments from the November 9, 2022 meeting. USEPA indicated on November 22, 2022 that they have additional comments to the draft response to comments/calculations provided. These additional comments were provided to Evergreen on December 15, 2022. Based on the USEPA having additional comments, the planned December 2022 porewater sampling event has tentatively been moved to January 2023 to allow time for Evergreen to provide response to comments. Evergreen will provide the response to comments the week of January 9th and Evergreen and USEPA will be meeting on January 16, 2023 to discuss the response to comments and path forward for the additional porewater sampling.

The schedule for the major milestones is provided below and the detailed schedule is included in Attachment A.

Task	Schedule
PDI Activities	3/2022 – 5/2022
Bench Scale Treatability Testing	5/2022 – 10/2022
Additional Porewater Sampling	1/2023
Pilot Testing	On pause
IM Performance Monitoring	On pause

Very truly yours,
SANBORN, HEAD & ASSOCIATES, INC.



Colleen Costello, P.G.
Senior Vice President



Chelsey Shepsko, Ph.D., P.E.
Senior Project Engineer

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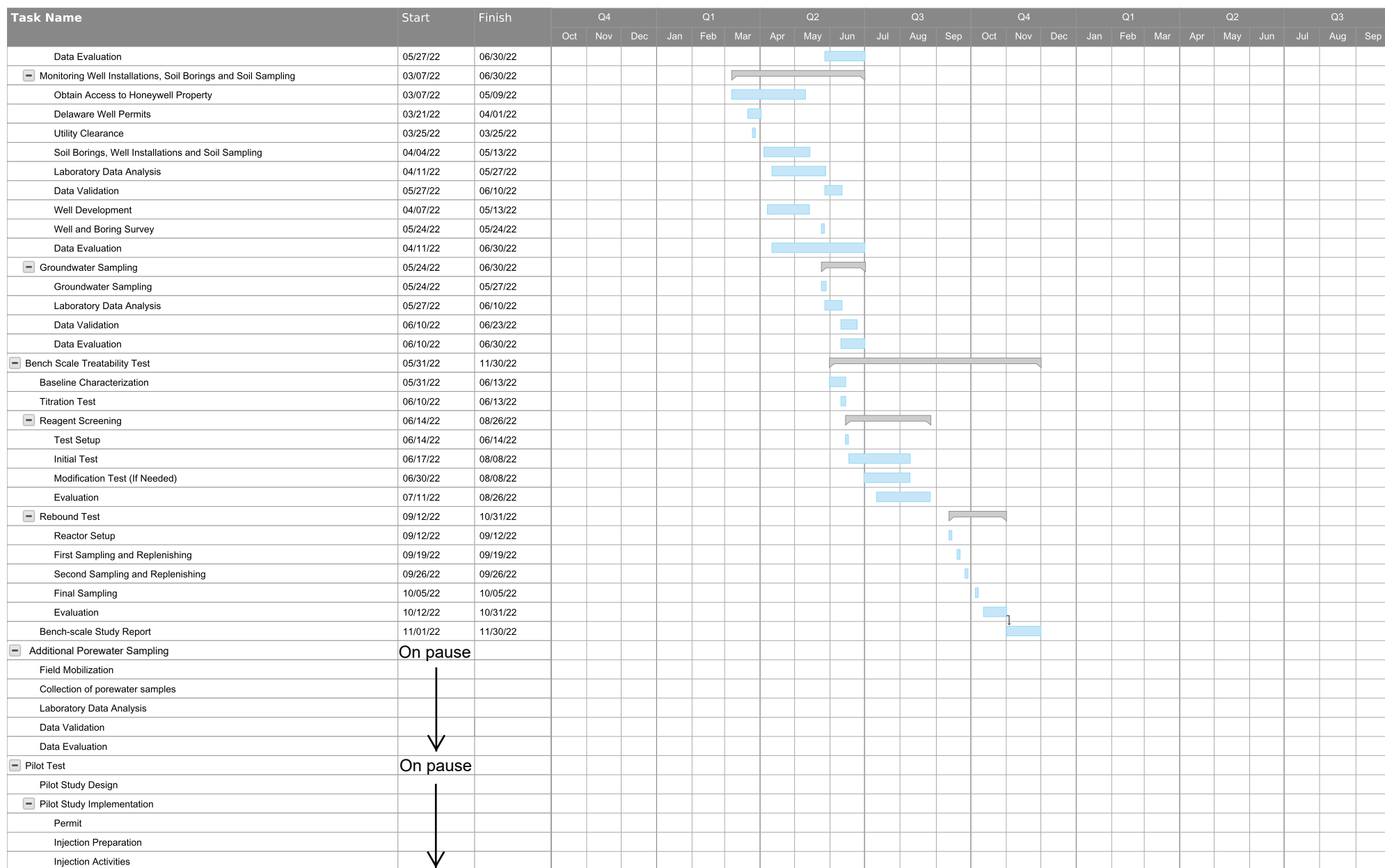
Attachments

Attachment A – Interim Measures Implementation Schedule

P:\4800s\4862.04\Source Files\Monthly Reports\Reports\December_2022\20221222_AOI 7 Monthly USEPA Report.docx

Attachment A
Updated Interim Measure Implementation Schedule
Evergreen
Marcus Hook, Pennsylvania

Task Name	Start	Finish	Q4			Q1			Q2			Q3			Q4			Q1			Q2			Q3		
			Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep
Submit IM Workplan to EPA	12/09/21	12/09/21			<div><div></div></div>																					
EPA Approval of IM Workplan	12/10/21	02/15/22			<div><div></div></div>																					
<div>Monthly Report to EPA</div>	01/31/22	08/31/23																								
January 2022 Monthly Report	01/31/22	01/31/22				<div><div></div></div>																				
February 2022 Monthly Report	02/28/22	02/28/22					<div><div></div></div>																			
March 2022 Monthly Report	03/31/22	03/31/22						<div><div></div></div>																		
April 2022 Monthly Report	04/29/22	04/29/22							<div><div></div></div>																	
May 2022 Monthly Report	05/31/22	05/31/22								<div><div></div></div>																
June 2022 Monthly Report	06/30/22	06/30/22									<div><div></div></div>															
July 2022 Monthly Report	07/29/22	07/29/22										<div><div></div></div>														
August 2022 Monthly Report	08/31/22	08/31/22											<div><div></div></div>													
September 2022 Monthly Report	09/30/22	09/30/22												<div><div></div></div>												
October 2022 Monthly Report	10/31/22	10/31/22													<div><div></div></div>											
November 2022 Monthly Report	11/30/22	11/30/22														<div><div></div></div>										
December 2022 Monthly Report	12/30/22	12/30/22															<div><div></div></div>									
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August 2023 Monthly Report	08/31/23	08/31/23																							<div><div></div></div>	
<div>PDI</div>	03/07/22	06/30/22																								
PDI Mobilization	03/22/22	05/31/22																								
<div>Sediment and Porewater Sampling</div>	03/22/22	05/31/22																								
Field Mobilization	03/22/22	03/22/22																								
Collection of sediment samples and grab porewater samples	03/22/22	03/25/22																								
Collection of DGT porewater samples	03/22/22	03/23/22																								
Laboratory Data Analysis	03/28/22	04/29/22																								
Data Validation	04/26/22	05/10/22																								
Data Evaluation	04/18/22	05/31/22																								
<div>GW Elevation and GW Flow Evaluation</div>	03/25/22	06/30/22																								
Installation of Transducers	04/08/22	04/08/22																								
Deployment of Groundwater Flow Meter	05/24/22	05/24/22																								
Install stilling well	03/25/22	03/25/22																								
Data Collection	04/08/22	05/27/22																								



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